

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA)	CRIMINAL NO. 1:07CR265
)	
v.)	Trial Date: February 20, 2008
)	
INGRID DINA LEVY,)	Hon. James C. Cacheris
Defendant)	

GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS

The government respectfully requests the Court to include in its questions to the panel of prospective petit jurors the following instructions.

Respectfully submitted,

Chuck Rosenberg
United States Attorney

By: /s/
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Thomas S. Dougherty
Trial Attorney
U.S. Department of Justice
Computer Crime & Intellectual Property Section

REQUEST NO. 1

Do any of you know or recognize Jay Prabhu, Assistant United States Attorney, or Thomas Dougherty, Trial Attorney, U.S. Department of Justice, Computer Crime & Intellectual Property Section, who will be prosecuting this case, or Special Agent Gregory Ryman of the Federal Bureau of Investigation, who is sitting at counsel table with the prosecutors?

Do any of you know anyone who works at the United States Attorney's office or the U.S. Department of Justice?

REQUEST NO. 2

Do any of you know or recognize the defendant, Ingrid Dina Levy?

REQUEST NO. 3

Do any of you know or recognize Marc Agnifilo, Sarah Moffett, or Steven Brown, attorneys for Ingrid Dina Levy?

REQUEST NO. 4

Are any of you or members of your immediate family an attorney or paralegal?

REQUEST NO. 5

Is there anyone who would believe, or disbelieve, the testimony of a law enforcement agent solely because he or she is a law enforcement agent?

REQUEST NO. 6

Have you or any member of your family had any problems or dispute with, or claim against, any department of the United States Government including the Department of Justice?

Have you, or any member of your family, been the subject of an investigation by any agency of the United States Government, or ever been a defendant in a suit brought by the federal government?

REQUEST NO. 7

Has anyone served as a juror in a criminal or civil trial or as a member of a grand jury either in the Federal or State Courts? [If any juror indicates that he or she has so served, it is requested that the following inquiries be made.]

Without going into the nature of the case, would you please answer the following questions:

1. Did you serve on a grand jury or a petit jury?
2. Where did you serve? In a Federal or State Court?
3. When did you serve?
4. Was it a civil or criminal case?
5. Was the case given to the jury for deliberation?
6. Without stating the verdict, would you please state whether the jury returned a verdict?
7. Do you feel that your previous participation as a juror would in any way impair or interfere with your ability to serve as a fair and impartial juror in this case?

REQUEST NO. 8

Have you or any member of your immediate family ever participated in a criminal case as a complainant, a defendant, witness for the Government or defendant or in some other capacity?

[If any juror indicates participation, it is requested that the following inquiries be made at the bench.]

1. Was this a Federal, State or local proceeding?
2. Without going into detail, would you please describe the nature of your involvement?

REQUEST NO. 9

Have you or any member of your immediate family ever participated in a civil case involving charges of fraud as a complainant, a defendant, witness, or in some other capacity? [If any juror indicates participation, it is requested that the following inquiries be made at the bench.]

1. Was this a Federal, State or local proceeding?
2. Without going into detail, would you please describe the nature of your involvement?

REQUEST NO. 10

Is there anyone who feels that if he or she were selected to sit as a juror on this case, that they would be unwilling or unable to render a verdict based solely on this evidence presented at this trial and the law as I will give it to you in my instructions?

REQUEST NO. 11

Does anyone have any other matter which you feel you should call to my attention which may have some bearing on your qualifications as a juror or which you feel may prevent you from rendering a fair and impartial verdict based solely upon the evidence and my instructions as to the law?

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of February, 2008, I will electronically file the foregoing with the Clerk of Court using the CM/ECF, which will then send a notification of such filing (NEF) to the following:

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